# UNITED STATES DISTRICT COURT

for the

101 1111			
Eastern District of Tennessee			
Mac's Convenience Stores LLC )			
v. ) Case No.: 1:23-cv-00284			
Kaish LLC and Akbar Bhamani			
Naisti EEC aliu Akbai Bhamaili )			
BILL OF COSTS			
<u> </u>	Defenda	ants	,
the Clerk is requested to tax the following as costs:			
Fees of the Clerk		\$	405.00
Fees for service of summons and subpoena			350.00
Fees for printed or electronically recorded transcripts necessarily obtained for use in the case			
Fees and disbursements for printing			
Fees for witnesses (itemize on page two)			0.00
Fees for exemplification and the costs of making copies of any materials where the copies are necessarily obtained for use in the case.			
Docket fees under 28 U.S.C. 1923			
Costs as shown on Mandate of Court of Appeals			
Compensation of court-appointed experts			
Compensation of interpreters and costs of special interpretation services under 28 U.S.C. 1828			
Other costs (please itemize)			
	TAL	\$	755.00
SPECIAL NOTE: Attach to your bill an itemization and documentation for requested costs in all cat	egories.		
Declaration	8		
I declare under penalty of perjury that the foregoing costs are correct and were necessarily is services for which fees have been charged were actually and necessarily performed. A copy of this in the following manner:  ☐ Electronic service			
s/ Attorney: Andrea L. Marconi			
Name of Attorney: Andrea L. Marconi			
For: Mac's Convenience Stores, LLC  Name of Claiming Party	Date:	05/13/	/2025
Taxation of Costs			
Costs are taxed in the amount of	and in	ncluded in the	e judgment.
$D_{r,r}$			

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Deputy Clerk
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Clerk of Court

## UNITED STATES DISTRICT COURT

Witness Fees (computation, cf. 28 U.S.C. 1821 for statutory fees)								
	ATTEN	DANCE	E SUBSISTENCE		CE MILEAGE		Total Cost	
NAME , CITY AND STATE OF RESIDENCE	Days	Total Cost	Days	Total Cost	Miles	Total Cost	Each Witness	
							\$0.00	
							\$0.00	
							\$0.00	
							\$0.00	
							\$0.00	
							\$0.00	
					ТС	OTAL	\$0.00	

#### NOTICE

#### Costs will be taxed in accordance with this Court's Guidelines on Preparing Bills of Cost. E.D. TN. LR. 54.1

#### Section 1924, Title 28, U.S. Code (effective September 1, 1948) provides:

"Sec. 1924. Verification of bill of costs."

"Before any bill of costs is taxed, the party claiming any item of cost or disbursement shall attach thereto an affidavit, made by himself or by his duly authorized attorney or agent having knowledge of the facts, that such item is correct and has been necessarily incurred in the case and that the services for which fees have been charged were actually and necessarily performed."

#### See also Section 1920 of Title 28, which reads in part as follows:

"A bill of costs shall be filed in the case and, upon allowance, included in the judgment or decree."

## The Federal Rules of Civil Procedure contain the following provisions: RULE 54(d)(1)

Costs Other than Attorneys' Fees.

Unless a federal statute, these rules, or a court order provides otherwise, costs — other than attorney's fees — should be allowed to the prevailing party. But costs against the United States, its officers, and its agencies may be imposed only to the extent allowed by law. The clerk may tax costs on 14 day's notice. On motion served within the next 7 days, the court may review the clerk's action.

#### **RULE 6**

(d) Additional Time After Certain Kinds of Service.

When a party may or must act within a specified time after service and service is made under Rule5(b)(2)(C), (D), (E), or (F), 3 days are added after the period would otherwise expire under Rule 6(a).

#### **RULE 58(e)**

Cost or Fee Awards:

Ordinarily, the entry of judgment may not be delayed, nor the time for appeal extended, in order to tax costs or award fees. But if a timely motion for attorney's fees is made under Rule 54(d)(2), the court may act before a notice of appeal has been filed and become effective to order that the motion have the same effect under Federal Rule of Appellate Procedure 4(a)(4) as a timely motion under Rule 59.

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## UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE SOUTHERN DIVISION

MAC'S CONVENIENCE STORES LLC, a Delaware limited liability company,

Plaintiff,

v.

KAISH LLC, a Tennessee limited liability company, and AKBAR BHAMANI, an individual,

Defendants.

Civil Action No. 1:23-cv-00284

#### AFFIDAVIT OF ANDREA L. MARCONI

- I, Andrea L. Marconi, declare as follows:
- 1. I am an attorney and director at the law firm of Fennemore Craig, P.C., which is lead counsel of record for Plaintiff Mac's Convenience Stores LLC ("Mac's") in the above-captioned matter. I have personal knowledge and/or have made a good faith inquiry of the facts as stated herein. If called to testify, I could and would be competent to testify to the same.
- 2. The costs incurred and expended by Mac's in this action with respect to Defendants Kaish LLC ("Kaish") and Akbar Bhamani ("Bhamani") (collectively, "Defendants") that may be recovered are as follows:

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DATE	BILL OF COSTS CATEGORY	DESCRIPTION	TOTAL
12/5/2023	Fees of the clerk	District Court for the Eastern District of Tennessee New Case Filing Fee - Complaint	\$405.00
1/12/2024	Service of summons and complaint	Fees for three attempts to serve summons and complaint to Kaish LLC and Akbar Bhamani	\$100.00
3/4/2024	Fees for service of summons and complaint	Stakeout for service of summons and complaint	\$250.00
		TOTAL:	\$755.00

- 3. Documentation supporting these costs is attached hereto as Exhibit 1.
- 4. Pursuant to Rule 54(d)(1) of the Federal Rules of Civil Procedure, Local Rule 54.1 of the Eastern District of Tennessee, and 28 U.S.C. § 1920, Mac's claims these costs against Defendants.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED this 13th day of May, 2025.

By: Under & Marcois

Andrea L. Marconi

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing has been served via notice automatically generated by the Court's ECF filing system and U.S. Mail on this 13th of May, 2025 to the following addresses:

**Kaish LLC** 

Attn: Akbar Bhamani 1170 Bar Harbor Place Lawrenceville, GA 30043

Akbar Bhamani

1170 Bar Harbor Place Lawrenceville, GA 30043

/s/ Lynn Marble	
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# EXHIBIT 1

# Print > Security & Support ~ Withdrawals/Debits 🖨 Show ending daily balance \$250.00 transaction of each day do not reflect any pending withdrawals or holds on deposited funds that may have been outstanding on your account when the The Available Balance shown above reflects the most up-to-date information available on your account. The balances shown below next to the last $Q \mid B$ Sign Off $\mid Q$ Welcome transaction posted. If you had insufficient available funds when the transaction posted to your account, fees may have been assessed. Deposits/Credits ♦ Plan & Learn ~ Switch Account • Transfer & Pay ~ Declines ZELLE TO WYATT ROOSEVELT ON 04/04 REF #RP0S4M2FPM No pending transactions meet your search criteria. Please try again. Withdrawals Checks Brokerage Dewnload Account Activity. | Track Claims Deposits Description ⊕ WELLS FARGO Transactions Chending Transactions Posted Transactions A Account Summary Accounts ~ Details ⊕ 50/08/25 £2/20/103/52 ⊕ 201/03/52 ⊕ 12/18/24 age (-) 904/04/24 O Search of 8

\$100.00

ZELLE TO WYATT ROOSEVELT ON 01/12 REF #RPORVTKCMY BTR SERVICE

Category: Other Outgoing Transfers

⊖ 01/12/24

#### Live Database

## U.S. District Court - Eastern District of Tennessee **Internet Payment History for Coleman, Jason Irving** 4/13/2023 to 5/13/2025

Case no.	Date Paid	Description	Payment Method	Receipt #	Amount
1:23-cv- 00284-TAV- CHS	2023-12-04 23:57:20	Complaint(1:23-cv-00284) [cmp cmp] (405.00)	cr card	ATNEDC- 5536523	\$ 405.00
1:23-cv- 00284-TAV- CHS	2023-12-05 00:18:35	Motion for Leave to Appear Pro Hac Vice(1:23-cv-00284) [motion apprphv] ( 90.00)	cr card	ATNEDC- 5536527	\$ 90.00
1:23-cv- 00284-TAV- CHS	2023-12-06 08:34:11	Motion for Leave to Appear Pro Hac Vice(1:23-cv-00284-TAV-CHS) [motion apprphy] ( 90.00)	cr card	ATNEDC- 5537837	\$ 90.00

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